

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Quantas EDMOND

Case: 2:21-mj-30172

Assigned To : Unassigned

Assign. Date : 4/14/2021

CMP: SEALED MATTER (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 21, 2021 in the county of Washtenaw in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. 841(a)(1); 841(b)(1)(B)(iii)

Possession with Intent to Distribute More Than 28 grams of Cocaine Base

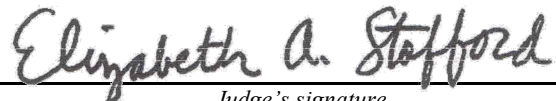
18 U.S.C. 922(g)(1)

Felon in Possession of a Firearm

18 U.S.C. 924(c)

Use of Firearm During Drug Trafficking Crime

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.*Complainant's signature*Special Agent Michael S. Parsons - ATF*Printed name and title*Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: April 14, 2021*Judge's signature*City and state: Detroit, MichiganHonorable Elizabeth Stafford, U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Michael S. Parsons, being duly sworn, do hereby state the following:

I. INTRODUCTION

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I have been a Special Agent since September of 2000. I have been involved in numerous investigations regarding firearms, firearms licensing, and narcotic laws resulting in successful federal prosecutions.

2. The statements contained in this affidavit are based on my personal knowledge, my review of written police reports by the Livingston and Washtenaw Narcotics Enforcement Team (LAWNET), and information provided to me by and/or through other law enforcement agents, investigators, and individuals with knowledge of this matter. This affidavit does not provide all the information known to law enforcement about this investigation.

3. This affidavit provides information necessary to establish probable cause that Quantas EDMOND (XX/XX/1989) has violated 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(iii) – Possession with Intent to

Distribute More Than 28 Grams of Cocaine Base; 18 U.S.C. § 922(g)(1) – Prohibited Person in Possession of a Firearm; and 18 U.S.C. § 924(c) – Use of Firearm During Drug Trafficking Crime.

II. PROBABLE CAUSE

4. On January 21, 2021, LAWNET detectives received information that Quantas EDMOND was in possession of large quantities of cocaine and crack cocaine and may possibly be armed. This information was relayed to Michigan State Police Trooper/Canine Handler (Tpr.) Jeffery Schrieber. LAWNET detectives conducted a surveillance detail in the area of Hewitt and Michigan Avenue and observed EDMOND driving his 2009 gray Chevrolet Tahoe with license plate number XXXX28.

5. Tpr. Schrieber observed EDMOND driving east bound on Michigan Avenue with a defective head lamp. Tpr. Schrieber conducted a traffic stop and informed EDMOND as to the reason for the traffic stop. Tpr. Schrieber requested EDMOND exit his vehicle, and he conducted a pat down for officer's safety. While conducting the pat down, Tpr. Schrieber noticed bulges coming from EDMOND's front pant pockets consistent with large amounts of currency. Tpr. Schrieber

asked EDMOND if he had any narcotics or weapons in his possession, EDMOND stated “no.” Tpr. Schrieber then asked EDMOND if he would allow a search of his vehicle, EDMOND again stated “no.”

6. Tpr. Schrieber conducted a narcotics search on the exterior of EDMOND’s vehicle with Canine Woodson who gave a positive indication for the odor of narcotics. Tpr. Schrieber conducted a search of the vehicle and located manufacturing materials consistent with the manufacturing of crack cocaine; plastic bags; two cellular phones; approximately 82 grams of suspected crack cocaine; 72 grams of suspected cocaine; \$1,850.00 in US currency; and a stolen Springfield Model XD, 40 caliber pistol.

7. Based on my training and experience, the manufacturing materials, the quantity of narcotics, and the seized cash, I believe EDMOND possessed with intent to distribute the controlled substances. The quantity of the drugs alone is consistent with the intent to distribute and not mere possession for personal use/consumption.

8. Based on my training and experience, the possession of the firearm furthered his drug trafficking activities. The pistol was strategically located so that it was quickly and easily available for use.

The pistol was located between the driver's seat and center console. The pistol was loaded and ready to fire with a round in the chamber. The firearm allowed him, if necessary, to protect not only the drugs but the proceeds from the drug sales as well. Defendant is a felon and was prohibited from possessing the firearm. And, the firearm was found in the same location – the vehicle – as the cocaine base, cocaine, and cash.

9. LAWNET detectives conducted a TruNarc scan of the suspected cocaine and crack cocaine seized from EDMOND, each resulting in a positive scan for cocaine base. LAWNET also examined the \$1,850.00 seized from EDMOND, \$240.00 of which came back as LAWNET pre-recorded funds that were used in an undercover narcotics purchase of crack cocaine from EDMOND.

10. LAWNET detectives photographed the materials seized from EDMOND. An image of one of those photographs is pictured below:



11. A criminal history check was conducted on EDMOND, which revealed that he has been convicted of the following felonies in the state of Michigan:

a. 2007 – Assault or Assault and Battery of a DHS

Employee; punishable by up to 2 years imprisonment; and

b. 2013 – Controlled Substance Possession Less Than 25

Grams; punishable by up to 4 years imprisonment.

12. EDMOND's felony convictions in each of the above cases were obtained by guilty plea. I am aware that the Michigan Court Rules require a court to directly advise a defendant of the maximum possible penalty before accepting a guilty plea. Therefore, probable cause exists that EDMOND knew, at the time he possessed the firearm, he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year.

13. Affiant is an expert in the Interstate Nexus of Firearms. The Springfield Model XD, 40 caliber pistol, recovered from EDMOND, was manufactured outside the State of Michigan, thereby travelling in interstate commerce.

III. CONCLUSION

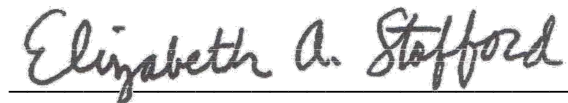
14. Probable cause exists that Quantas EDMOND, in the city of Ypsilanti in the Eastern District of Michigan, possessed with intent to distribute more than 28 grams of cocaine base; in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(iii).

15. Probable cause also exists that EDMOND knowingly possessed the above-described firearm: said firearm having traveled in interstate commerce; in violation of 18 U.S.C. § 922(g)(1) and possessed the firearm in furtherance of his aforementioned drug-trafficking crime; in violation of 18 U.S.C. § 924(c).



Michael S. Parsons
Special Agent, ATF

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Honorable Elizabeth Stafford
United States Magistrate Judge

Date: April 14, 2021